RFP-1325 02 (REV 10/97)
Previously RF-46522

CORRES CONTROL
INCOMING LTR NO

01696 RF 97

DUE DATE
ACTION

13 NOV 97 3:44

- RFETS-CC-

Department of Energy

ROCKY FLATS FIELD OFFICE
P O BOX 928
GOLDEN, COLORADO 80402-0928

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97-DOE-05437

DIST	LTR	ENC
BACON, R.F.		
BENSUSSEN, S.J.		
BORMOLINI, A.M.		
BRAILSFORD, M.D		
BURDGE, L.		
CARD, R.G.		
COSGROVE, M. M.		
COULTER, W.L.		
CRAWFORD, A.C.		
DERBY, S.		
DIETERLE, S.E.		
FERRERA, D.W.		
FERRERA, K.P.		
GERMAIN, A.L.		
HARDING, W.A.		
HARROUN, W.P.		
HEDAHL, T.G.		
HERRING, C.L.		
HILL, J.A.		
MARTINEZ, L.A.		
NORTH, K.	X	
PARKER, A.		
PHILLIPS, F.J.	X	
RHOADES, D.W.		
RUSCITTO, D.G.		
SANDLIN, N.B.		
SPEARS, M.S.		
TILLER, R. E.		
VOORHEIS, G.M.		
[illegible]	X	
COR. CONTROL	X	X
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PATS/T130G		

Reviewed for Addressee
Corres Control RFP

11/13/97 [signature]
Date By

Ref Ltr #

DOE ORDER # 5400.1

Ms. Susan Chaki
Colorado Department of Public Health and the Environment
Hazardous Materials and Waste Management Division
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Dear Ms Chaki

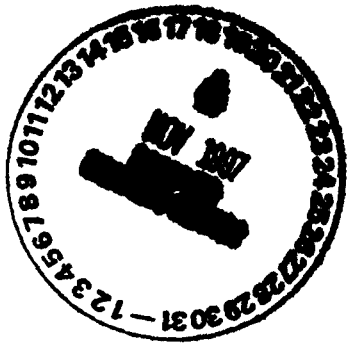
This letter has been prepared in response to six comments received from the Colorado Department of Public Health and Environment regarding the Close-out Report for the Source Removal of Polychlorinated Biphenyls (PCBs) accelerated cleanup project

The first comment is in regard to the validation of PCB Method 8080 confirmation samples and the submittal of an addendum containing this data. As you may be aware, the site has a current backlog on data requiring validation. Rocky Mountain Remediation Services (RMRS) is in the process of seeking third-party data validation for the PCB confirmation results. A tentative schedule has been established and shows that validation processes should be complete by April 30, 1998. Upon completion of the validation process, RMRS will submit the addendum for transmittal to the agencies

The second comment requests a project breakdown as documented in Section 3 3 - Closeout Reports of the *Rocky Flats Cleanup Agreement Implementation Guidance Document* The project cost breakdown is as follows: $305K for planning, characterization, and field preparation, and $610K for excavation, site restoration and waste disposition The total project cost was $915K.

In response to the third comment, it is noted that confusion exists with regard to the two terminologies between Potential Areas of Concern (PACs) and Toxic Substance Control Act/PCB sites. To clarify this issue, only the PAC terminology will be used in the future, and specifically with the addendum to this report. This terminology is consistent with the Historical Release Report (HRR) and Rocky Flats Cleanup Agreement.

The fourth comment addresses a discrepancy. Specifically, when the First Annual Update to the HRR (DOE, 1996) was prepared in August 1996, work was halted until a



cc:
R. Greenberg, EM-45, HQ
J. Legare, AMEC, RFFO
B. April, RLG, RFFO
R Tyler, ER/WM, RFFO
N. Castaneda, ER/WM, RFFO
T Greenard, SAIC
A. Primrose, RMRS
T Rehder, EPA
J. Lillich, EPA
G Kleeman, EPA
S. Tarlton, CDPHE
C. Spreng, CDPHE
Administrative Record

safety review could be performed at PAC 700-1102 The HRR document was released to the agencies in September 1996, subsequent to approval from plant safety to attempt one final cleanup at PAC 700-1102. For this reason, soil volumes, confirmation data, and total depth are inconsistent between the HRR document and the PCB Closeout Report. The Second Annual Update to the HRR (DOE, 1997) is consistent with the PCB Close-out Report.

The fifth comment pertains to PAC 600-1000, a location extensively sampled as a late addition to the project. Method 8080 confirmation samples were collected as identified in Table 3-2 and support the remediation goal of this site from 159ppm PCBs (Table 2-1), to levels under 5ppm. Throughout the project, the Method 4020 immunoassay results consistently demonstrate a conservative bias (i.e., the standards are designed to show a result below regulatory limits). Table 3-2 shows that the site is confirmed to be cleaned to less than 25ppm total PCBs. In the long term, PAC 600-1000 will remain proposed as a No Further Action site until addressed under the Industrial Area Operable Unit Record of Decision

The sixth and final comment suggests that Section 3.3 be clarified. All concrete transformer pads and adjacent concrete were sampled, characterized, and dispositioned in accordance with the approved Proposed Action Memorandum. The only concrete that remained intact was that adjacent to PAC 300-708 and PAC 600-1000, which were confirmed to be clean using Environmental Protection Agency Method 8080 analysis for PCBs While we agree that your language would enhance Section 3.3, the PCB Closeout Report was issued as final and we do not believe an errata sheet is warranted for this clarification.

Following the completion of the data validation and evaluation, we will be forwarding the addendum to you. If you should have any issues or concerns regarding the PCB Closeout Report, please contact Norma I Castaneda at (303) 966-4226, or contact me at (303) 966-4839.

Sincerely,

John C. Morris

for Steven W Slaten
RFCA Coordinator